

# Exhibit K

**From:** [Henrik Parker](#)  
**To:** [Bowen, Tyler R. \(PHX\)](#); [Brice Lynch](#); [Olga Slobodyanyuk](#); [Ahmed ElDessouki](#); [Barry Shelton](#); [Bradley Coburn](#); [Garza, Cat](#); [Campbell, Chad \(PHX\)](#); [dadams](#); [Smith, Darren](#); [David Harper](#); [david mccombs](#); [David Whittlesey](#); [DG-RenesasDC](#); [Drew Holmes](#); [eric green](#); [Joy Wang](#); [Ta, Janice \(AUS\)](#); [kevin@radip.com](#); [Kieran Kieckhefer](#); [marc collier](#); [Matt Berkowitz](#); [Patrick Colsher](#); [Morin, Philip A. \(SDQ\)](#); [richard zembek](#); [scott cole](#); [seanpak](#); [Sivinski, Stephanie](#); [qe-nvidia-oceansemiconductor](#); [SiLabs Ocean](#) [NRF@nortonrosefulbright.com](#)  
**Cc:** [oceانsemi-dlf](#); [Timothy Devlin](#)  
**Subject:** RE: Ocean Semiconductor litigation  
**Date:** Wednesday, April 6, 2022 2:25:14 PM  
**Attachments:** [image001.png](#)

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Counsel:

Ocean disagrees with your self-serving characterization of Ocean's Preliminary Infringement Contentions. Those contentions properly articulate Ocean's theories of infringement and provide defendants with more than sufficient notice to move forward with any and all aspects of discovery. Ocean sees no legitimate reason why the entire schedule needs to be extended by three months or more.

Nevertheless, in an effort to accommodate defendants' alleged concerns, Ocean is willing to consider extending the close of fact discovery by a month while modifying the various deadlines thereafter up to, but not including, the November 16 Final Pretrial Conference so as to shorten the intervals between deadlines to allow for that month extension of discovery. In other words, the schedule between the close of fact discovery and the Final Pretrial Conference would be tightened up by a month, but the Final Pretrial Conference date and the date for Trial would remain the same.

Please let Ocean know if this is an agreeable compromise.

Best regards,  
Rik



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**From:** Bowen, Tyler R. (PHX) <[TBowen@perkinscoie.com](mailto:TBowen@perkinscoie.com)>  
**Sent:** Tuesday, April 5, 2022 1:36 PM  
**To:** Henrik Parker <[hparker@devlinlawfirm.com](mailto:hparker@devlinlawfirm.com)>; Brice Lynch <[bricelynch@quinnemanuel.com](mailto:bricelynch@quinnemanuel.com)>;

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**Cc:** oceansemi-dlf <oceansemi-dlf@devlinlawfirm.com>; Timothy Devlin <tdevlin@devlinlawfirm.com>

**Subject:** RE: Ocean Semiconductor litigation

Rik,

The current schedule prejudices defendants. As defendants have repeatedly explained in correspondence, Ocean's preliminary infringement contentions are defective. They do not identify colorable infringement theories or indicate how Ocean interprets the plain meaning of the claims. Because of the recent extension of the final contentions deadline, defendants will remain in the dark for nearly two more months. And Ocean has noted it is likely to seek to expand the scope of this already unwieldy set of cases by attempting to add new accused systems. Based on these factors, it is not reasonable to expect discovery to close or opening expert reports to be served with just a few weeks after Ocean provides final infringement contentions. Indeed, while the court's default schedule provides 22 weeks between the final contentions deadline and close of discovery, the current schedule in these cases includes less than 6 weeks between those events. Depending on the scope and content of Ocean's contentions, defendants are likely to need to engage in third-party discovery to obtain relevant materials from, for example, suppliers of accused systems, foundries, and potential sources of prior art. The current compressed case schedule does not provide defendants with sufficient time to adequately prepare their defenses.

Please let us know by the end of the day tomorrow whether Ocean will oppose defendants' proposed extension.

Regards,  
Tyler

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**From:** Henrik Parker <[hparker@devlinlawfirm.com](mailto:hparker@devlinlawfirm.com)>  
**Sent:** Monday, April 04, 2022 1:54 PM

**To:** Bowen, Tyler R. (PHX) <[TBowen@perkinscoie.com](mailto:TBowen@perkinscoie.com)>; Brice Lynch <[bricelynnch@quinnmanuel.com](mailto:bricelynnch@quinnmanuel.com)>; Olga Slobodyanyuk <[olgaslobodyanyuk@quinnmanuel.com](mailto:olgaslobodyanyuk@quinnmanuel.com)>; Ahmed ElDessouki <[Ahmed.EIDessouki@Shearman.com](mailto:Ahmed.EIDessouki@Shearman.com)>; Barry Shelton <[bshelton@winston.com](mailto:bshelton@winston.com)>; Bradley Coburn <[bcoburn@winston.com](mailto:bcoburn@winston.com)>; Garza, Cat <[cat.garza@nortonrosefulbright.com](mailto:cat.garza@nortonrosefulbright.com)>; Campbell, Chad (PHX) <[CSCampbell@perkinscoie.com](mailto:CSCampbell@perkinscoie.com)>; dadams <[dadams@sgbfir.com](mailto:dadams@sgbfir.com)>; Smith, Darren <[darren.smith@nortonrosefulbright.com](mailto:darren.smith@nortonrosefulbright.com)>; David Harper <[david.harper@haynesboone.com](mailto:david.harper@haynesboone.com)>; david mccoomb <[david.mccoomb@haynesboone.com](mailto:david.mccoomb@haynesboone.com)>; David Whittlesey <[David.Whittlesey@Shearman.com](mailto:David.Whittlesey@Shearman.com)>; DG-RenesasDC <[DG.RenesasDC@goodwinlaw.com](mailto:DG.RenesasDC@goodwinlaw.com)>; Drew Holmes <[drewholmes@quinnmanuel.com](mailto:drewholmes@quinnmanuel.com)>; eric green <[eric.green@nortonrosefulbright.com](mailto:eric.green@nortonrosefulbright.com)>; Joy Wang <[Joy.Wang@Shearman.com](mailto:Joy.Wang@Shearman.com)>; Ta, Janice (AUS) <[JTa@perkinscoie.com](mailto:JTa@perkinscoie.com)>; [kevin@radip.com](mailto:kevin@radip.com); Kieran Kieckhefer <[Kieran.Kieckhefer@Shearman.com](mailto:Kieran.Kieckhefer@Shearman.com)>; marc collier <[marc.collier@nortonrosefulbright.com](mailto:marc.collier@nortonrosefulbright.com)>; Matt Berkowitz <[Matt.Berkowitz@Shearman.com](mailto:Matt.Berkowitz@Shearman.com)>; Patrick Colsher <[patrick.colsher@shearman.com](mailto:patrick.colsher@shearman.com)>; Morin, Philip A. (SDO) <[PMorin@perkinscoie.com](mailto:PMorin@perkinscoie.com)>; richard zembek <[richard.zembek@nortonrosefulbright.com](mailto:richard.zembek@nortonrosefulbright.com)>; scott cole <[scottcole@quinnmanuel.com](mailto:scottcole@quinnmanuel.com)>; seanpak <[seanpak@quinnmanuel.com](mailto:seanpak@quinnmanuel.com)>; Sivinski, Stephanie <[stephanie.sivinski@haynesboone.com](mailto:stephanie.sivinski@haynesboone.com)>; qe-nvidia-oceansemiconductor <[qe-nvidia-oceansemiconductor@quinnmanuel.com](mailto:qe-nvidia-oceansemiconductor@quinnmanuel.com)>; [SiLabs\\_Ocean\\_NRF@nortonrosefulbright.com](mailto:SiLabs_Ocean_NRF@nortonrosefulbright.com)

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**Subject:** RE: Ocean Semiconductor litigation

Tyler:

Can defendants please explain to Ocean why the current schedule is “unreasonable” as you have termed it?

Best regards,

Rik



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**From:** Bowen, Tyler R. (PHX) <[TBowen@perkinscoie.com](mailto:TBowen@perkinscoie.com)>

**Sent:** Monday, April 4, 2022 9:49 AM

**To:** Henrik Parker <[hparker@devlinlawfirm.com](mailto:hparker@devlinlawfirm.com)>; Brice Lynch <[bricelynnch@quinnmanuel.com](mailto:bricelynnch@quinnmanuel.com)>; Olga Slobodyanyuk <[olgaslobodyanyuk@quinnmanuel.com](mailto:olgaslobodyanyuk@quinnmanuel.com)>; Ahmed ElDessouki

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**Subject:** Ocean Semiconductor litigation

Rik,

The recent two-month extension of the final contentions deadline, on top of an initial agreed-upon two-month extension, renders the current schedule in Ocean Semiconductor cases in W.D. Tex. unreasonable. At least ST, Silicon Labs, MediaTek, Western Digital, NVIDIA, and NXP plan to request that the court extend discovery, expert discovery, and dispositive motion deadlines by roughly three months. Please let us know before the end of the day on Wednesday, April 6 whether Ocean will agree to this proposed extension or oppose it. We are also available for a call on Tuesday or Wednesday to discuss by phone, if that would be helpful.

Regards,  
Tyler

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